

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. : _____
ENRICO CARPENITO,	:	VIOLATIONS:
a/k/a "Rico,"		
MICHAEL PACITTI	:	18 U.S.C. § 371 (conspiracy- 1 count)
JOHN SEGARS		18 U.S.C. § 1029 (credit card fraud -
JAMES BERRY	:	13 counts)
PATRICIA MASON		18 U.S.C. § 2314 (interstate transportation
ANGELO SAPIENZA	:	of stolen property - 1 count)
CHRISTOPHER PACITTI		18 U.S.C. 922 (g)(1) (possession of firearm
JOSEPH SMALL	:	by convicted felon -2 counts)
TIMOTHY FARMER		18 U.S.C. § 2 (aiding and abetting)
JOSEPH TRAVIA	:	18 U.S.C. § 924 (d) (criminal forfeiture)
JOSEPH MEHL		18 U.S.C. § 982 (a)(2)(B) (criminal
RONALD COPPERTINO	:	forfeiture)
ROSEMARY AMICONE		
ANTHONY COISOMIA,	:	
a/k/a "Anthony Crisomia,"		
SAMANTHA AMMAR	:	
THERESA SHOESTER		
DINA RIDOLFO	:	
CHRISTINE DALY		
JOHN JAMES BROADLEY	:	
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Discover, Visa, Master Card, and American Express were credit card companies operating in and affecting interstate commerce.

2. At all times material to this indictment, Strawbridge's, Macy's and JC Penney were retail businesses, operating in and affecting interstate commerce, that issued credit cards to customers.

3. From in or about 1996, through on or about the date of this indictment, in the Eastern District of Pennsylvania and elsewhere, defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
MICHAEL PACITTI
JOHN SEGARS
JAMES BERRY
PATRICIA MASON
ANGELO SAPIENZA
CHRISTOPHER PACITTI
JOSEPH SMALL
TIMOTHY FARMER
JOSEPH TRAVIA
JOSEPH MEHL
RONALD COPPERTINO
ROSEMARY AMICONE
ANTHONY COISOMIA,
a/k/a "Anthony Crisomia,"
SAMANTHA AMMAR
THERESA SHOESTER
DINA RIDOLFO
CHRISTINE DALY and
JOHN JAMES BROADLEY**

knowingly and intentionally conspired and agreed together and with others known and unknown to the grand jury to:

(1) use unauthorized access devices, with the intent to defraud, and by such conduct obtain anything of value aggregating \$1,000 or more during a one year period, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029 (a) (2); and

(2) transport in interstate commerce goods, wares, merchandise, securities and money, of the value in excess of \$5,000, knowing the same to have been stolen, converted and taken by fraud, in violation of Title 18, United States Code, Section 2314.

MANNER AND MEANS

4. It was part of the conspiracy that defendants ENRICO CARPENITO, a/k/a “Rico,” MICHAEL PACITTI, JOHN SEGARS, JAMES BERRY, PATRICIA MASON, ANGELO SAPIENZA, CHRISTOPHER PACITTI, JOSEPH SMALL, TIMOTHY FARMER, JOSEPH TRAVIA, JOSEPH MEHL, RONALD COPPERTINO, ROSEMARY AMICONE, ANTHONY COISOMIA, a/k/a “Anthony Crisomia,” SAMANTHA AMMAR, THERESA SHOESTER, DINA RIDOLFO, CHRISTINE DALY, and JOHN JAMES BROADLEY (further referred to as the defendants) and others known and unknown to the grand jury, met in Philadelphia, Pennsylvania at various times and traveled to New Jersey to steal personal identification, checks and credit cards in order to fraudulently obtain goods, wares, merchandise and money valued over \$5,000.

5. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury surreptitiously entered parked and unoccupied vehicles at golf courses, swim clubs, fitness facilities, marinas and other public facilities because it was commonly known that individuals who utilized these facilities would leave their wallet, purse or pocketbook locked inside vehicles.

6. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury surreptitiously entered the vehicles by using "slim jims," lock picks, master keys and altered keys and, once access was gained to the vehicles, removed credit cards, checks, driver's licenses, and social security cards from wallets, purses and pocketbooks

found in the vehicles.

7. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury purchased gasoline with the stolen credit cards to determine if the credit cards had been compromised and/or called the credit card company to ascertain the spending limit of the credit card.

8. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury traveled to casinos in Atlantic City, New Jersey and obtain cash advances with the stolen credit cards.

9. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury used the stolen credit cards at home improvement stores, electronic stores, office supply stores, gasoline stations and other similar retail establishments located in New Jersey, Pennsylvania and Delaware to fraudulently purchase goods, wares, merchandise and services.

10. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury forged securities, that is, checks, stolen from the victims, and cashed them at banks.

11. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury stole the identity of the victims to rent automobiles and to fraudulently obtain credit accounts at various retail establishments.

12. It was further part of the conspiracy that the defendants and others known and unknown to the grand jury returned at various times to the Eastern District of Pennsylvania with stolen goods, merchandise, wares, money and property.

13. It was further part of the conspiracy that the defendants and others

known and unknown to the grand jury sold or "fenced" fraudulently obtained goods, merchandise, wares and property.

Overt Acts

On or about the dates set forth below, in order to achieve the objects of the conspiracy, defendants and other persons known and unknown to the grand jury committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about March 13, 1998, defendants ENRICO CARPENITO, ANGELO SAPIENZA, and others known and unknown to the grand jury traveled to the Body Max Fitness Center, in Sewell, New Jersey, and stole from a vehicle credit cards issued to victim LC.

2. On or about March 13, 1998, defendants ENRICO CARPENITO, ANGELO SAPIENZA, and others known and unknown to the grand jury made purchases totaling approximately \$5,635 at Saks Fifth Avenue, Lower Merion, Pennsylvania, with the stolen credit cards belonging to victim LC.

3. On or about May 21, 1998, defendants TIMOTHY FARMER, JOSEPH MEHL, JOSEPH TRAVIA and others known and unknown to the grand jury traveled to New Jersey and stole from a vehicle a Master Card ending in 4332, a Discover Card ending in 4283, a driver's license, and a social security card issued to victim MT and used the stolen credit cards to make cash advances and purchases totaling approximately \$5,277 at Trump Plaza, Caesars, and Trump World's Fair casinos in Atlantic City, New Jersey.

4. On or about November 13, 1998, defendant JOSEPH SMALL and others known and unknown to the grand jury traveled to the Discovery Museum, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license belonging to victim LB.

5. On or about November 13, 1998, defendant JOSEPH SMALL and others known and unknown to the grand jury used victim LB's identity to open an account at BJ's Wholesale Club, Deptford, New Jersey and used the account to make fraudulent purchases in the amount totaling approximately \$3,350.

6. On or about November 19, 1998, defendant JOSEPH SMALL and others known and unknown to the grand jury traveled to the Cherry Hill Racquet Club, Cherry Hill, New Jersey and stole from a vehicle a New Jersey Drivers license, an MBNA Visa ending in 0501, a Partners First Visa ending in 9636, and a Bank Boston Visa ending in 2049 belonging to victim RW.

7. On or about November 19, 1998, defendant JOSEPH SMALL and others known and unknown to the grand jury then traveled to the Showboat Casino, Atlantic City, New Jersey, and made a cash advance attempt totaling approximately \$3,000 using the stolen credit cards belonging to victim RW.

8. On or about December 12, 1998, defendant TIMOTHY FARMER attempted to fraudulently purchase a watch in the amount of approximately \$3300 using stolen credit cards and identification belonging to victim CL.

9. On or about December 18, 1998, defendant TIMOTHY FARMER and others known and unknown to the grand jury traveled to the Royal Courts Fitness Center, Barrington, New Jersey and stole from a vehicle a driver's license, a Capital One Visa ending in 8384, a Discover Card ending in 5016 and personal checks belonging to victim CM.

10. On or about December 18, 1998, defendant TIMOTHY FARMER and others known and unknown to the grand jury used the stolen Capital One Visa belonging to victim CM

to purchase jewelry valued at approximately \$7,000 in Philadelphia, Pennsylvania.

11. On or about December 18, 1998, defendant TIMOTHY FARMER and others known and unknown to the grand jury caused one of the stolen personal checks belonging to victim CM to be fraudulently cashed at Audubon Savings Bank, Audubon, New Jersey, in the name of CL, in the amount of approximately \$3,242.

12. On or about January 4, 1999, defendant JOSEPH SMALL and others known and unknown to the grand jury traveled to New Jersey, stole a Merrill Lynch Visa ending in 1701 belonging to the victim PF and subsequently used the credit card to conduct a fraudulent cash advance at the Caesars Casino, Atlantic City, New Jersey in an amount of approximately \$500 and to attempt an additional cash advance of approximately \$500.

13. On or about January 25, 1999, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Jewish Community Center, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, a Discover Card ending in 0338, a GTE Federal Credit Union Visa ending in 3304, and four personal bank checks, belonging to victim SB.

14. On or about January 25, 1999, defendant JOHN SEGARS and others known and unknown to the grand jury used the Discover card to conduct fraudulent cash advances at Bally's Park Place Casino, Atlantic City, New Jersey, in the amount of approximately \$1,056 and the Claridge Casino, Atlantic City, New Jersey in the amount of approximately \$2100 and fraudulently used the GTE Federal Credit Union Visa to conduct cash advances at Sands Casino, Atlantic, New Jersey in the amount of approximately \$2,100 and at the Claridge Casino, Atlantic City, New Jersey in the amount of approximately \$2,100.

15. On or about January 28, 1999, defendants JOHN SEGARS and JOSEPH MEHL, and others known and unknown to the grand jury traveled to Gold's Gym, Delran, New Jersey and stole from vehicles a Master Card ending in 9013, an American Express Card ending in 3006, an American Express Corporate Card ending in 2008, a driver's license, and a personal check belonging to victim MH; a New Jersey driver's license, a Master Card ending in 8002, and a social security card belonging to victim TE; a Visa ending in 6123 belonging to victim MP; a Master Card ending in 0476 belonging to victim PF; and a Master Card ending in 7723, and a Discover Card ending in 4232 belonging to victim CA; and caused these credit cards to be fraudulently used in various locations including the Sands Casino, Atlantic City, New Jersey for cash advances and purchases totaling approximately \$15,389.

16. On or about January 28, 1999, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Royal Courts Fitness Center, Barrington, New Jersey and stole from a vehicle a New Jersey drivers license, a Nations Bank Visa ending in 3543, and a CitiBank Visa ending in 9829 belonging to victim MB and fraudulently used the Nations Bank Visa to obtain cash advances and attempted cash advances at casinos in Atlantic City, New Jersey totaling approximately \$19,808.

17. On or about February 8, 1999, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to Bally's Fitness, Voorhees, New Jersey and stole from a vehicle a New Jersey driver's license, a Chase Visa ending in 5466 and a Chevy Chase Visa ending in 2779 belonging to victim SI and subsequently fraudulently used the Chevy Chase Visa to obtain cash advances at casinos in Atlantic City, New Jersey totaling approximately \$5,523.

18. On or about February 20, 1999, defendant JOHN SEGARS and others known

and unknown to the grand jury traveled to Echelon Skating Center, Voorhees, New Jersey and stole from a vehicle a New Jersey driver's license and a Mellon Visa ending in 7603 belonging to victim MC and fraudulently used the stolen credit card to conduct cash advances at a casino in Atlantic City, New Jersey, totaling approximately \$4,000.

19. On or about February 27, 1999, defendant JOSEPH SMALL and others known and unknown to the grand jury traveled to New Jersey and stole from a vehicle a New Jersey driver's license, a First Union Master Card ending in 3983, a Chase Visa Card ending in 4634, and a GM Master Card ending in 5718 belonging to victim WD.

20. On or about February 27, 1999, defendant JOSEPH SMALL and others known and unknown to the grand jury fraudulently used the stolen GM Master Card belonging to victim WD to conduct retail purchases at the Philadelphia, Pennsylvania locations of S and K Jewelers, in the amount of approximately \$655; Forman Mills, in the amount of approximately \$196; and Mobil Oil, in the amount of approximately \$9.

21. On or about February 27, 1999, defendant JOSEPH SMALL and others known and unknown to the grand jury fraudulently used the stolen First Union Master Card belonging to victim WD to conduct fraudulent cash advances at casinos in Atlantic City, New Jersey totaling approximately \$4,326.

22. On or about February 27, 1999, defendant JOSEPH SMALL and others known and unknown to the grand jury fraudulently used the stolen Chase Visa belonging to victim WD to conduct a cash advance at the Trump Taj Mahal Casino, Atlantic City, New Jersey in the amount of approximately \$2,627.

23. On or about March 18, 1999, defendants ENRICO CARPENITO,

CHRISTOPHER PACITTI, MICHAEL PACITTI, JOHN SEGARS and JOSEPH SMALL, and others known and unknown to the grand jury traveled to the Buena Vista Country Club, Buena Vista, New Jersey and stole from a vehicle a Chevy Chase Visa ending in 2963 belonging to victim RB and subsequently fraudulently used the stolen credit card to conduct a fraudulent cash advance in Atlantic City, New Jersey at the Trump Taj Mahal Casino in the amount of approximately \$2,000.

24. On or about March 30, 1999, defendants ENRICO CARPENITO and JOHN SEGARS, and others known and unknown to the grand jury traveled to the Pennsauken Country Club, Pennsauken, New Jersey and stole from a vehicle a Pennsylvania driver's license, an American Express Card and an Avanta Credit Card ending in 0019 belonging to victim EL and subsequently attempted to conduct a fraudulent retail purchase utilizing the stolen Avanta credit card at the New York Gold Broker, Atlantic City, New Jersey in the amount of approximately \$4,107 and another attempted fraudulent retail purchase at the Littman Jewelers, Hammonton, New Jersey in the amount of approximately \$4,131.

25. On or about April 16, 1999, defendants CHRISTOPHER PACITTI and JOHN SEGARS, and others known and unknown to the grand jury traveled to the Royal Courts Fitness Center, Barrington, New Jersey and stole from a vehicle a New Jersey driver's license, a social security card, three personal Commerce Bank checks, and a Chase Master Card ending in 1160 belonging to victim CB and subsequently caused two of the Commerce Bank checks to be fraudulently cashed in Cherry Hill, New Jersey in the amounts of approximately \$1,000 and \$1,650.

26. On or about June 15, 1999, defendants JOHN SEGARS, MICHAEL

PACITTI, JOSEPH SMALL and JAMES BERRY and others known and unknown to the grand jury traveled to Rancocas Country Club, Willingboro, New Jersey and stole from vehicles three Commerce Bank personal checks and a BJ's Wholesale Club Card belonging to victim SD, a New Jersey driver's license and a Chase Visa ending in 3302 belonging to victim JD, a Discover Credit Card ending in 9837 belonging to victim NJ and a RCI Rewards Visa Card ending in 6527, a Chase Shell Master Card ending in 4891, a New Jersey driver's license, and a social security card belonging to victim RL.

27. On or about June 15, 1999, defendants JOHN SEGARS, MICHAEL PACITTI, JOSEPH SMALL and JAMES BERRY and others known and unknown to the grand jury also traveled to Laurel Creek Country Club, Mount Laurel, New Jersey and stole from a vehicle a Maryland driver's license, an LL Bean Visa Card, and a USAA Master Card belonging to victim GC.

28. On or about June 15, 1999, defendants JOHN SEGARS, MICHAEL PACITTI, JOSEPH SMALL and JAMES BERRY and others known and unknown to the grand jury fraudulently used the stolen credit card of victim NJ to conduct cash advances at the Tropicana casino in Atlantic City, New Jersey in the amount of approximately \$3,000 and attempted an additional cash advance in the amount of approximately \$3,000.

29. On or about September 2, 1999, defendant JOHN JAMES BROADLEY and others known and unknown to the grand jury traveled to the Betty and Milton Katz Jewish Community Center, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a Chase Visa Card ending in 0191, and a First Union Visa Check Card ending in 1029 belonging to victim MJ and subsequently fraudulently used the stolen First Union Visa to

conduct approximately a \$532 cash advance at the Harrah's Marina Casino, Atlantic City, New Jersey and the stolen Chase Visa to obtain approximately a \$5 127 cash advance at the Harrah's Marina Casino.

30. On or about September 8, 1999, defendants ENRICO CARPENITO, JOHN SEGARS, JOHN JAMES BROADLEY and CHRISTINE DALY and others known and unknown to the grand jury traveled to the Aquatic Fitness Center, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a social security card, a Discover Card ending in 8879, a Visa Card ending in 3046, and a Mobil Gas Card ending in 2001 belonging to victim KW and subsequently fraudulently used the stolen identification and the Discover Card at the Trump Taj Mahal Casino, Atlantic City, New Jersey to conduct fraudulent cash advances in the amounts of approximately \$4,000 and \$500.

31. On or about November 3, 1999, defendants JOHN SEGARS and THERESA SHOESTER, and others known and unknown to the grand jury traveled to the Cherry Hill Racquet Club, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a social security card, a Visa Card ending in 6840, and a Chase Master Card ending in 8923 belonging to victim MU and subsequently fraudulently used the stolen Visa credit card and identification to conduct cash advances at casinos in Atlantic City, New Jersey totaling approximately \$6,255.

32. On or about November 16, 1999, defendant THERESA SHOESTER and others known and unknown to the grand jury traveled to the Echelon Skating Center, Voorhees, New Jersey and stole from a vehicle a New Jersey driver's license and an MBNA Master Card ending in 9704 belonging to victim DP and subsequently fraudulently used the stolen credit card

to conduct cash advances in Atlantic City, New Jersey at casinos totaling approximately \$6,255.

33. On or about December 4, 1999, defendant JOHN SEGARS, ENRICO CARPENITO and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to Storybook Land, Egg Harbor, New Jersey and stole from a vehicle a Bank of America Visa ending in 5528, an Acme Visa ending in 1218, and a Nations Bank Visa ending in 5528 belonging to victim PS and subsequently fraudulently used the stolen Bank of America Visa credit card to conduct cash advances at the casinos in Atlantic City, New Jersey totaling approximately \$10,356.

34. On or about December 18, 1999, defendants ENRICO CARPENITO, JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to the Aquatic Fitness Center, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a social security card, a Chase Visa ending in 7055, a Universal Discover Card ending in 3061, and a Fleet Master Card ending in 7444 belonging to victim LR and subsequently fraudulently used the stolen Discover Card and identification to conduct a cash advance at the Resorts Casino, Atlantic City, New Jersey in the amount of approximately \$3,128 and the stolen Fleet Master Card and identification to conduct a cash advance at the Hilton Casino, Atlantic City, New Jersey in the amount of approximately \$2,100.

35. On or about January 13, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Jewish Community Center, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a Discover Card ending in 8298, and a CitiBank Master Card ending in 6316, belonging to victim SB and subsequently fraudulently used the stolen Master Card to attempt a cash advance at the Caesars Hotel Casino,

Atlantic City, New Jersey in the amount of approximately \$3,000.

36. On or about January 30, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to Bear Creek Ski Resort, Longswamp Township, Pennsylvania, and stole from a vehicle a Pennsylvania Driver's License and a Chase Visa ending in 6987, belonging to victim KP, then traveled to Atlantic City, New Jersey and subsequently fraudulently conducted a credit card cash advance on the stolen Chase Visa Card at the Trump Casino in the amount of approximately \$4629 and an attempted cash advance at Harrah's Casino in the amount of approximately \$4,627.

37. On or about February 5, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to Bear Creek Ski Resort, Longswamp Township, Pennsylvania, and stole from a vehicle a Pennsylvania driver's license, a Visa ending in 9689, a Discover Card ending in 0862, a Master Card ending in 5975, a Fleet Master Card ending in 6586, a Fleet Visa ending in 3805, a First Union check card ending in 8026, a Sears credit card ending in 6816, and a JC Penny credit card ending in 1802 belonging to victim JD, then traveled to Atlantic City, New Jersey and fraudulently conducted a credit card cash advance on the stolen Fleet Visa at Bally's Park Place Casino in the amount of approximately \$3,127 and an attempted advance on the stolen Fleet Bank Master Card in the amount of approximately \$3000.

38. On or about February 6, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to Bear Creek Ski Resort, Longswamp Township, Pennsylvania, and stole from a vehicle a Pennsylvania driver's license, an American Express Credit Card ending in 1000, an American Express Card ending in 1003, a Discover Card ending in 9863, a Macy's Credit Card ending in 9550, an Empower Check Card ending in 3904, and a

Strawbridges's Credit Card ending in 6949 belonging to victim HM and then traveled to Atlantic City, New Jersey and fraudulently attempted to conduct a credit card cash advance using the stolen Discover Card, at the Trump Marina Casino in the amount of approximately \$3,000.

39. On or about February 17, 2000, defendants JOHN SEGARS and DINA RIDOLFO, and others unknown to the grand jury traveled to Bear Creek Ski Resort, Longswamp Township, Pennsylvania, and stole from a vehicle a Summit Bank Visa Debit Card ending in 1978, a GM Master Card ending in 3394, and a Discover Card ending in 7203, belonging to victim DE and fraudulently used the stolen credit cards at Boston Market, Easton, Pennsylvania; Payless Shoes, Souderton, Pennsylvania; Schuylkill Valley Sporting Goods, Pottstown, Pennsylvania; Rite Aid, Souderton, Pennsylvania; Pets Plus, Quakertown, Pennsylvania; Home Depot, Whitehall, Pennsylvania; Texaco, Foglesville, Pennsylvania; and Dollar Express, Quakertown, Pennsylvania.

40. On or about March 17, 2000, defendants JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to Gold's Gym, Monmouth Junction, New Jersey and stole from a vehicle a New Jersey driver's license, an MBNA Master Card ending in 9804, an MBNA Master Card ending in 5792, and a CitiBank Advantage Visa ending in 8392 belonging to victim WB and subsequently fraudulently used the stolen credit cards to conduct and attempt to conduct retail purchases at Office Max, Lawrence Township, New Jersey, in the amount of approximately \$2,606 and at Macy's, Lawrence Township, New Jersey, in the amount of approximately \$1,412.

41. On or about April 27, 2000, defendants JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to the Community Park

School Playground, Princeton Township, New Jersey and stole from a vehicle a New Jersey driver's license, a Summit Bank Visa ending in 0713, and a Meryll Lynch Visa ending in 7066 belonging to victim NM and fraudulently used the stolen credit cards to conduct retail purchases at Best Buy, West Windsor, New Jersey; Home Depot, West Windsor, New Jersey; Acme, Turnersville, New Jersey; CVS, Williamstown, New Jersey; and WalMart, Princeton, New Jersey.

42. On or about April 27, 2000, defendants JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury then traveled to Philadelphia, Pennsylvania and conducted fraudulent retail purchases using the stolen credit cards belonging to the victim NM at Mobil and Pathmark.

43. On or about August 22, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to Sewell, New Jersey and using a stolen identification of victim GS fraudulently cashed a stolen and forged Commerce Bank personal check belonging to victim DF in the amount of approximately \$285.

44. On or about August 24, 2000, defendants JOHN SEGARS and SMANTHA AMMAR and others known and unknown to the grand jury traveled to the Voorhees Soccer Fields, Voorhees, New Jersey, and stole from a vehicle a New Jersey driver's license, a Fleet Bank Debit Card ending in 3923, a Discover Card ending in 1422, a Discover Card ending in 5097 and a Master Card ending in 2761 belonging to victim MV and fraudulently used the stolen Fleet Bank Debit Card to conduct the credit card cash advances at Harrah's Casino, Atlantic City, New Jersey in the amounts of approximately \$3,127, \$1,575, \$1,056, and \$2,101.

45. On or about October 1, 2000, defendant JOHN SEGARS and others known

and unknown to the grand jury traveled to New Jersey and stole from a vehicle three Commerce Bank personal checks, a New Jersey driver's license, and three Visa Credit Cards belonging to victim DD and fraudulently cashed two of the stolen Commerce Bank checks at Commerce Bank, Washington Township, New Jersey, in the amounts each of approximately \$1,500.

46. On or about October 2, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to LA Fitness, Washington Township, New Jersey and stole from a vehicle a New Jersey driver's license, a CitiBank credit card, a social security card, and three Commerce Bank personal checks belonging to victim AH and then fraudulently cashed a stolen check, at Commerce Bank, Washington Township, New Jersey, in an amount of approximately \$954, and attempted to cash another stolen check at Commerce Bank, in an amount of approximately \$1,000.

47. On or about October 5, 2000, defendants JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to LA Fitness, Washington Township, New Jersey and stole from a vehicle a New Jersey driver's license, a Visa Debit Card and Commerce Bank personal checks, belonging to victim TC and then fraudulently cashed one of the stolen checks at Commerce Bank, Cherry Hill, New Jersey, in the amount of approximately \$934.50.

48. On or about October 12, 2000, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the LA Fitness, Washington Township, New Jersey, and stole from a vehicle a New Jersey driver's license, a social security card, a Discover Card, two Visa credit cards, and six personal checks belonging to victim LR and fraudulently cashed one check at Commerce Bank, Gloucester Township, New Jersey, in the amount of

approximately \$1,523 and attempted to fraudulently cash a second stolen check at Commerce Bank, Camden County College, New Jersey, in the amount of approximately \$1,523.

49. On or about October 14, 2000, defendants RONALD COPPERTINO, ANTHONY COISOMIA and ROSEMARIE AMICONE, and others known and unknown to the grand jury traveled to TW Sports, Egg Harbor, New Jersey and stole from a vehicle a Master Card ending in 8986 and a Bank of New York Visa ending in 2788, belonging to victim ED and fraudulently used the stolen credit cards to conduct fraudulent retail purchases at Staples, Hamilton Township, New Jersey; Acme, Hamilton Township, New Jersey; and Shop Rite, Williamstown, New Jersey.

50. On or about January 11, 2001, defendants RONALD COPPERTINO, ANTHONY COISOMIA and ROSEMARIE AMICONE, and others known and unknown to the grand jury traveled to the Tilton Athletic Club, Egg Harbor, New Jersey and stole from a vehicle a CitiBank Visa ending in 0369, and an MBNA Master Card ending in 8601 belonging to victim WM and fraudulently used the stolen MBNA Master Card to conduct retail purchases at Home Depot, Egg Harbor Township, New Jersey; Home Depot, Deptford, New Jersey; Just For Feet, Deptford, New Jersey; Home Depot, Cherry Hill, New Jersey; and Super Value, Mullica Hill, New Jersey.

51. On or about February 10, 2001, defendants RONALD COPPERTINO, ANTHONY COISOMIA and ROSEMARIE AMICONE, and others known and unknown to the grand jury traveled to the Tilton Athletic Club, Egg Harbor, New Jersey and stole from a vehicle a CitiBank Visa ending in 7343 and a First Union Visa Check Card ending in 1017 belonging to victim BL and fraudulently used the stolen CitiBank Visa to conduct retail purchases at Home

Depot, Vineland, New Jersey, in the amount of approximately \$2,102; and Toy's R Us, Vineland, New Jersey, in the amount of approximately \$1093.

52. On or about February 10, 2001, defendants RONALD COPPERTINO, ANTHONY COISOMIA and ROSEMARIE AMICONE, and others known and unknown to the grand jury traveled to the LA Fitness, Turnersville, New Jersey and stole from a vehicle a USAA Master Card ending in 3473, Richmond County Savings Bank Visa Check Card ending in 0924, and Texaco Credit Card ending in 3001 belonging to victim VM and fraudulently used the stolen USAA Master Card to conduct retail purchases at Village Pets, Williamstown, New Jersey; Staples, Turnersville, New Jersey; Pep Boys, Turnersville, New Jersey; and Fishers Fresh Meats, Williamstown, New Jersey.

53. On or about April 2, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic Club, Medford, New Jersey and stole from a vehicle an MBNA Visa ending in 7245 belonging to victim MF and fraudulently used the stolen MBNA Visa to attempt a \$371 retail purchase at WalMart, Turnersville, New Jersey; and to conduct approximately a \$17 purchase at Olga's Diner, Marlton, New Jersey, and approximately a \$38 purchase at Canals, Pennsauken, New Jersey; and then traveled to Philadelphia, Pennsylvania and fraudulently conducted retail purchases at Amoco in the amounts of approximately \$6 and \$12.

54. On or about April 2, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic Club, Medford, New Jersey and stole from a vehicle a New Jersey driver's license, Social Security Card, and Summit Visa ending in 7902 belonging to victim RB and fraudulently used the stolen Summit Visa card to conduct retail

purchases at Wawa, Medford, New Jersey; Staples, Marlton, New Jersey; Staples, Cherry Hill, New Jersey and Macy's, Cherry Hill; and then traveled to Philadelphia, Pennsylvania and fraudulently used the stolen Summit Visa to conduct retail purchases at Amoco and the Airport Tower Hotel.

55. On or about April 3, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic, Medford, New Jersey and stole from a vehicle a New Jersey driver's license, a Discover Card ending in 9248, and a Bank of America Master Card ending in 0652 belonging to victim CT and fraudulently used the stolen credit cards at Circuit City, Pleasantville, New Jersey; for cash advances at casinos in Atlantic City, New Jersey, and at Cumberland Farms Atlantic City, New Jersey.

56. On or about April 3, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic, Medford, New Jersey and stole from a vehicle a Discover Card ending in 7879, and a Visa ending in 2630 belonging to victim MP and used the stolen credit cards to conduct cash advances at casinos in Atlantic City, New Jersey, and a purchase at Cumberland Farms, Atlantic City, New Jersey.

57. On or about April 16, 2001, defendant ANOTHONY COISOMIA and others known and unknown to the grand jury traveled to Abington, Pennsylvania, and stole a Discover Card ending in 8465, an American Express Card ending in 1008, and an MBNA America Visa belonging to victim CG and fraudulently used the stolen credit cards to conduct retail purchases in Philadelphia, Pennsylvania at Dicks Sporting Goods, Rite Aide, Ames, Blockbuster, WalMart, and Best Buy, and in Fairless Hills, Pennsylvania, at WalMart, Blockbuster, and Best Buy.

58. On or about April 22, 2001, defendants JAMES BERRY, MICHAEL

PACITTI and ENRICO CARPENITO and others known and unknown to the grand jury traveled to Worlds Gym, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, Chase and CitiBank Credit Cards, and Commerce Bank personal checks belonging to victim JH and fraudulently cashed one of the stolen checks at Commerce Bank, Philadelphia, Pennsylvania, in the amount of approximately \$920.

59. On or about May 15, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic, Medford, New Jersey and stole from a vehicle a New Jersey driver's license, a CitiBank Master Card ending in 9561, and four Commerce Bank personal checks belonging to victim KF and fraudulently caused two of the stolen checks to be cashed at the Commerce Bank, Cherry Hill, New Jersey in the amounts of \$2,150 and \$2,000.

60. On or about May 17, 2001, defendant JOHN SEGARS and others known and unknown to the grand jury traveled to the Eastern Athletic, Medford, New Jersey and stole from a vehicle two fur coats valued at a total of approximately \$15,000 belonging to victim JR and then transported them back to Philadelphia, Pennsylvania.

61. On or about May 21, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to the Ramblewood Country Club, Mt. Laurel, New Jersey and stole from a vehicle a New Jersey driver's license, a Visa credit card, a Master Card credit card, and a Commerce Bank ATM card belonging to victim SB and fraudulently used the victim's identification at Sam's Club, Deptford, New Jersey to open a Sam's Club Membership and line of credit, and then used the line of credit to make purchases in the amount of approximately \$4,234.

62. On or about May 25, 2001, defendants JOHN SEGARS and DINA RIDOLFO, and others known and unknown to the grand jury traveled to the Tilton Athletic Club, Egg Harbor Township, New Jersey and stole from a vehicle a Visa Card ending in 2693 and a Discover Card ending in 5664 belonging to victim JB and fraudulently used the stolen credit cards to conduct retail purchases at K Mart, Pleasantville, New Jersey; Home Depot, Egg Harbor, New Jersey; Staples, Pleasantville, New Jersey; Staples, May's Landing, New Jersey; and in Philadelphia, Pennsylvania at Amoco.

63. On or about June 2, 2001, defendants ENRICO CARPENITO and PATRICIA MASON, and others known and unknown to the grand jury, traveled to Virtua Health, Voorhees, NJ, and stole from a vehicle a New Jersey driver's license, a Chase Manhattan Visa ending in 6810, an American Express Card, and a Visa Credit Card belonging to victim RA and fraudulently used the stolen credit cards to conduct fraudulent credit card cash advances at casinos in Atlantic City, New Jersey and then traveled to Philadelphia, Pennsylvania and utilized the stolen credit cards to conduct various fraudulent retail purchases in Philadelphia, Pennsylvania.

64. On or about June 6, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to the Ramblewood Country Club, Mt. Laurel, New Jersey and stole from a vehicle a New Jersey driver's license, an American Express Card ending in 1002 and a CitiBank Master Card ending in 7061 belonging to victim RH and fraudulently used the stolen credit cards to conduct retail purchases at Macy's, Deptford, New Jersey; Sam's Club, Deptford, New Jersey; T.G.I. Fridays, Somers Point, New Jersey; Sunoco, Philadelphia, Pennsylvania; and Broadway Jewelers, Philadelphia, Pennsylvania and also used the stolen

identification to open a Sam's Club Membership in Deptford, New Jersey.

65. On or about June 7, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to the Chartwell Swim Club, Evesham Township, New Jersey, and stole from a vehicle a New Jersey driver's license, a Commerce Bank personal check, an American Express Card ending in 1013, and an American Express Optima Card ending in 1011 belonging to victim MA and fraudulently attempted to use the stolen American Express Optima Card at Tweeter Electronics, Lawrenceville, New Jersey, to make a retail purchase in the amount of approximately \$3,969 and then fraudulently used the stolen Commerce Bank personal check to make the purchase at Tweeter Electronics in the amount of approximately \$3,969.

66. On or about June 13, 2001, defendants ENRICO CARPENITO and JAMES BERRY, and others known and unknown to the grand jury traveled to the Health Plex, Springfield Township, Pennsylvania, and stole from a vehicle a Master Card ending in 6830, a CitiBank Visa ending in 0591, an MBNA Visa ending in 1580, a Shell Master Card ending in 4711, and a Visa Credit Card ending in 1520 belonging to victim TS and fraudulently used the stolen Visa credit card at Dick's Sporting Goods, Deptford, New Jersey, to purchase golf clubs in the amount of approximately \$1,394.

67. On or about June 19, 2001, defendants ENRICO CARPENITO, JAMES BERRY and MICHAEL PACITTI, and others known and unknown to the grand jury traveled to the Tavistock Country Club, Haddonfield, New Jersey and stole from a vehicle an American Express Credit Card ending in 3005, a Bank of America Debit Card ending in 3118, and two Commerce Bank business checks belonging to victim MA and fraudulently used the stolen credit cards to make retail purchases at Comp USA, Wilmington, Delaware; Amoco, Wilmington,

Delaware; Sunoco, Philadelphia, Pennsylvania; a Telecommunications Store, Philadelphia, Pennsylvania, and fraudulently cashed two Commerce Bank business checks in Philadelphia, Pennsylvania at Commerce Bank in the amounts of \$4,400 and \$6,800.

68. On or about June 20, 2001, defendants ENRICO CARPENITO and JAMES BERRY, and others known and unknown to the grand jury traveled to the Jewish Community Center, Cherry Hill, New Jersey, and stole from a vehicle seven Commerce Bank personal checks, a New Jersey driver's license, a Social Security Card, and a Master Card Credit Card belonging to victim JW and fraudulently cashed two of the stolen Commerce Bank personal checks at two separate Commerce Bank locations in New Jersey in an amount totaling approximately \$5,000.

69. On or about June 23, 2001, defendant ENRICO CARPENITO and others known and unknown to the grand jury traveled to the Skate Zone, Voorhees, New Jersey, and stole from a vehicle a Minitola National Bank Check Card ending in 5591, a Bank of America Visa ending in 3506, and a Fleet Visa belonging to victim GP and fraudulently used the stolen Minitola National Bank Check Card to make retail purchases at Sam Ash Music, Cherry Hill, New Jersey, in the amount of approximately \$2,840.

70. On or about June 25, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to New Jersey and stole from a vehicle two Commerce Bank personal checks belonging to victim LS and fraudulently cashed the stolen Commerce Bank personal checks at Commerce Bank, Cherry Hill, New Jersey in the amount of approximately \$3,200.

71. On or about June 27, 2001, defendant JAMES BERRY and others known and

unknown to the grand jury traveled to the Cherry Hill Swim Club, Cherry Hill, New Jersey, and stole from a vehicle two Commerce Bank personal checks belonging to victim NF and fraudulently cashed one check at Commerce Bank, Bellmawr, New Jersey, in the amount of approximately \$4,800 and attempted to fraudulently cash the second check at Commerce Bank, Gloucester Township, New Jersey in the amount of approximately \$4,400.

72. On or about June 27, 2001, defendants JOHN SEGARS and DINA RIDOLFO, and others known and unknown to the grand jury traveled to Chartwell Swim Club, Evesham Township, New Jersey, and stole from a vehicle a New Jersey driver's license, a CitiBank Gold Credit Card ending in 2319, a CitiBank Credit Card ending in 9520, and a Social Security Card belonging to victim MB and fraudulently used the stolen CitiBank Credit Card to conduct a cash advance at the Hilton Casino, Atlantic City, New Jersey, in the amount of approximately \$3,327.

73. On or about July 7, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to the Chartwell Swim Club, Evesham Township, New Jersey, and stole from a vehicle a Commerce bank personal check belonging to victim DP and fraudulently cashed the stolen check at Commerce Bank, McDade Branch, Pennsylvania, in the amount of approximately \$2,600.

74. On or about July 14, 2001, defendants ENRICO CARPENITO, JAMES BERRY and PATRICIA MASON, and others known and unknown to the grand jury traveled to Tavistock Country Club, Haddonfield, New Jersey, and stole from a vehicle a CitiGroup Gold Credit Card ending in 6441, and three First Union personal checks belonging victim AP and fraudulently used the stolen credit card to make a retail purchase at Circuit City, Langhorne,

Pennsylvania in the amount of approximately \$2,172 and an attempted second fraudulent purchase at this store in the amount of approximately \$2,225.

75. On or about July 15, 2001, defendant MICHAEL PACITTI and others known and unknown to the grand jury traveled to the Cherry Valley Swim Club, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, a Social Security Card, an American Express credit card ending in 1004, a Master Card ending in 2243, a Master Card ending in 6661, and a Discover Card ending in 0140 belonging victim NG and fraudulently used the stolen credit cards to conduct retail purchases at Home Depot, Berlin, New Jersey; Rockaway Bedding, Berlin, New Jersey; and in Philadelphia, Pennsylvania to conduct two fraudulent purchases at Sunoco.

76. On or about July 16, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to Stratford Swim Club, New Jersey and stole from a vehicle a Commerce Bank personal check belonging to victim MS and fraudulently cashed the stolen check at Commerce Bank, Whitman Branch, Philadelphia, Pennsylvania, in the amount of approximately \$1,700.

77. On or about July 20, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to New Jersey and stole from a vehicle a Commerce Bank personal check belonging to victim LS and fraudulently cashed the stolen check at Commerce Bank, Atrium Branch, Cherry Hill, New Jersey, in the amount of approximately \$2,800.

78. On or about July 23, 2001, defendants ENRICO CARPENITO and JAMES BERRY, and others known and unknown to the grand jury traveled to the Wedgewood Swim Club, Haddonfield, New Jersey, and stole from a vehicle a MBNA Visa credit card ending in

5034, a Commerce bank MAC card, and a BJ's Wholesale Club Card belonging to victim BW and fraudulently used the stolen credit cards to make retail purchases at Home Depot, Philadelphia, Pennsylvania; and BJ's Wholesale Club, Maple Shade, New Jersey.

79. On or about July 25, 2001, defendants ENRICO CARPENITO, JAMES BERRY, and MICHAEL PACITTI, and others known and unknown to the grand jury traveled to New Jersey and stole from a vehicle a Visa Credit Card ending in 9499, and a BJ's Wholesale Club Card ending in 2290, belonging to victim DG and attempted to fraudulently obtain electronic equipment using the stolen credit cards at BJ's Wholesale Club, Deptford, New Jersey.

80. On or about July 25, 2001, defendants ENRICO CARPENITO, JAMES BERRY, and MICHAEL PACITTI, and others known and unknown to the grand jury traveled to Ramblewood Country Club, Mount Laurel, New Jersey and stole from a vehicle a Visa/Master Card ending in 9837 belonging to victim DK and fraudulently used the stolen credit card to conduct retail purchases at Home Depot, Deptford, New Jersey, in the amount of approximately \$1,163.

81. On or about July 28, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury traveled to All Seasons Marina, Ocean City, New Jersey and stole from a vehicle a social security card, a Discover Card ending in 9007, a Sam's Club Card ending in 4146, a CitiBank Visa Platinum ending in 7381, an MBNA AAA Visa ending in 6077, and a CitiBank Drivers Edge ending in 0685 belonging to victim LR and attempted to fraudulently use the stolen credit cards to purchase retail items in Sam's Club, Cape May County, New Jersey, in the amount of approximately \$2,000.

82. On or about July 29, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury traveled to Chester Valley Golf Club, Pennsylvania, and stole from a vehicle a Pennsylvania driver's license, an MBNA Platinum Plus Visa ending in 8493 , and a social security card belonging to victim EH, then traveled to Sam's Club, Deptford, New Jersey and fraudulently obtained a Sam's Club credit account by utilizing the victim's stolen identity, accessed the line of credit and fraudulently used it to make approximately \$1,509 in retail purchases, and also traveled to Circuit City, Deptford, New Jersey and made fraudulent retail purchases on the stolen credit cards totaling approximately \$3,179.

83. On or about July 30, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to Sam's Club, Franklin Mills, Philadelphia, Pennsylvania, and accessed the Sam's Club Line of Credit fraudulently obtained on July 29, 2001 and conducted retail purchases totaling approximately \$461.

84. On or about August 1, 2001, defendants ENRICO CARPENITO and JAMES BERRY and others known and unknown to the grand jury traveled to Sam's Club, Deptford, New Jersey and Sam's Club, Atlantic City, New Jersey and accessed the Sam's Club utilizing the membership fraudulently obtained on July 29, 2001 and made retail purchases totaling approximately \$3,509.

85. On or about August 1, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury traveled to the Home Depot, Philadelphia, Pennsylvania and fraudulently obtained a Home Depot credit account by utilizing the victim EH's stolen identity and the line of credit was then accessed and

fraudulently used to make approximately \$4,994 in retail purchases.

86. On or about August 3, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to Enterprise Rental Car, Philadelphia, Pennsylvania, and utilizing EH's stolen identity, fraudulently rented a 2001 Pontiac Grand Prix.

87. On or about September 5, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to Enterprise Rental Car, Philadelphia, Pennsylvania, and utilizing EH's stolen identity, fraudulently rented a 2001 Chevrolet Impala, which was never returned to Enterprise Rental Car, with the value of the stolen 2001 Chevrolet Impala being approximately \$19,200.

88. On or about October 5, 2001, defendant JAMES BERRY and others known and unknown to the grand jury traveled to Enterprise Rental Car, Philadelphia, Pennsylvania, and utilizing EH's stolen identity, fraudulently rented a 2001 Buick Regal, which was never returned to Enterprise Rental Car, with the value of the stolen 2002 Buick Regal being approximately \$22,000.

89. On or about July 31, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury traveled to the YMCA, Chadds Ford, PA, and stole from a vehicle an ATT Master Card ending in 3648, a Sears Gold Master Card ending in 4070, and an MBNA Master Card ending in 1931, belonging to victim WS.

90. On or about August 1, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury traveled to Sam's Club, Deptford, New Jersey and Sam's Club, Atlantic City, New Jersey and fraudulently

used the stolen Sears Master card belonging to victim WS to purchase electronic equipment and a computer totaling approximately \$3,509.

91. On or about August 1, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury attempted to fraudulently use the stolen MBNA Master Card belonging to victim WS to obtain two cash advances at Global Cash Access, Atlantic City, New Jersey totaling approximately \$5,227.

92. On or about August 1, 2001, defendants ENRICO CARPENITO, MICHAEL PACITTI, and JAMES BERRY and others known and unknown to the grand jury attempted to fraudulently use the stolen ATT Master Card belonging to victim WS at Dick's Sporting Goods, Deptford, NJ to purchase a set of golf clubs totaling approximately \$1,356.

93. On or about August 4, 2001, defendants ENRICO CARPENITO and MICHAEL PACITTI, and others known and unknown to the grand jury, traveled to Buena Vista Golf Course, Buena Vista, New Jersey, and stole from a vehicle a social security card, an American Express Business Account ending in 3195, a Sunoco Credit Card, a Discover Card ending in 7209, a Solomon Smith Barney Visa ending in 4873, a Chase Credit Card ending in 9723, and an MBNA Visa ending in 3102, belonging to victim SH and fraudulently used the stolen credit cards to conduct a retail purchase at Boaters World, May's Landing, New Jersey in the amount of approximately \$3,339 of fishing reels and a color global positioning system and at Home Depot, Egg Harbor, New Jersey in the amount of approximately \$1,397.

94. On or about August 4, 2001, defendants ENRICO CARPENITO and MICHAEL PACITTI, and others known and unknown to the grand jury traveled to Scotland Run Golf Course, Williamstown, New Jersey and stole from a vehicle eight Commerce Bank business

checks belonging to victim DH and attempted to cash one of the stolen checks at Commerce Bank

95. On or about August 9, 2001, defendants JAMES BERRY and PATRICIA MASON, and others known and unknown to the grand jury traveled to North Hampton Country Club, Richboro, Pennsylvania, and stole from a vehicle a Master Card belonging to victim JS and fraudulently used the stolen Master Card to conduct a retail purchase at Sam's Club, Williamstown, New Jersey in the amount of approximately \$2,861.

96. On or about August 23, 2001, defendants ENRICO CARPENITO, PATRICIA MASON and JAMES BERRY and others known and unknown to the grand jury traveled to the Discovery Museum, Cherry Hill, New Jersey and stole from a vehicle a Pennsylvania driver's license, a Sam's Club membership card, a PNC Bank MAC card, an ATT Master Card ending in 1202, and a Fleet Bank credit card belonging to victim MO and fraudulently used the stolen ATT Master Card to make retail purchases at Sam's Club, Deptford, New Jersey in the amount of approximately \$2,098; and then traveled to the Philadelphia Park Race Track, Philadelphia, Pennsylvania, and conducted a cash advance on the stolen ATT Master Card in the amount of approximately \$525 and a cash advance on the stolen Fleet credit card in the amount of approximately \$525 .

97. On or about August 24, 2001, defendants PATRICIA MASON and JAMES BERRY and others known and unknown to the grand jury traveled to the Discovery Museum, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, a BJ's Wholesale Club membership card ending in 6353, an ATM card, and a Visa credit card ending in 3275 belonging to victim CW; traveled to Home Depot, Mt. Laurel, New Jersey and fraudulently

obtained a Home Depot credit account by utilizing the victim's stolen identity and accessed and used the credit line fraudulently obtained to conduct approximately \$486 in retail purchases; and traveled to BJ's Wholesale Club, Springfield, Pennsylvania and fraudulently used the stolen Visa credit card to conduct retail purchases in the amount of approximately \$1,454.

98. On or about August 29, 2001, defendants RONALD COPPERTINO and ROSEMARIE AMICONE, and others known and unknown to the grand jury traveled to Tavistock Swim Club, Haddonfield, New Jersey, and stole from a vehicle a Chase Visa ending in 5038 belonging to victim MA and attempted to fraudulently purchase jewelry at Cabinet Goldsmith, Haddonfield, New Jersey on the stolen Chase Visa card in the amount of approximately \$6,990; and successfully used the stolen Chase Visa to fraudulently purchase retail products at the Trail Boss, Haddonfield, New Jersey in the amount of approximately \$1,332.

99. On or about October 5, 2001, defendant PATRICIA MASON and others known and unknown to the grand jury traveled to the Discovery Museum, Cherry Hill, New Jersey and stole from a vehicle a New Jersey driver's license, a CitiBank Master Card ending in 9295, an Equity Visa Check Card ending in 3447, a BJ's Wholesale Membership Card, and a Children's Place Credit Card belonging to victim KS; traveled to Sam's Club, Williamstown, New Jersey and fraudulently utilized the victim's identity to open a Sam's Club Membership and a Sam's Club Charge Account and fraudulently accessed the charge account to make retail purchases in the amount of approximately \$2,000; fraudulently used the stolen CitiBank Master Card to make a retail purchase in the amount of approximately \$578; traveled to Staples, Turnersville, New Jersey, and attempted to fraudulently use the stolen CitiBank Master Card to make retail purchases in the amount of approximately \$2,752; and traveled to Philadelphia,

Pennsylvania and fraudulently utilized the stolen Equity Visa to purchase gas in the amount of approximately \$33.

100. On or about October 9, 2001, defendant PATRICIA MASON and others known and unknown to the grand jury traveled to the Cherry Hill Health and Racquet Club, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, a Fleet Bank ATM Card ending in 3810, and a Master Card ending in 8274, belonging to victim LM and fraudulently used the stolen Master Card to conduct retail purchases at Best Buy, Deptford, New Jersey in the amount of approximately \$2,013.

101. On or about October 13, 2001, defendants JOHN SEGARS and SAMANTHA AMMAR, and others known and unknown to the grand jury traveled to the Soccer Fields, Cropwell and Evesham Roads, Cherry Hill, New Jersey, and stole from a vehicle a New Jersey driver's license, a Gold Master Card ending in 6796, a Platinum Discover Card, and a Strawbridge's Credit Card belonging to victim JB and then traveled to Philadelphia Park Race Track, Philadelphia, Pennsylvania and attempted to conduct a fraudulent cash advance utilizing the victim's stolen identity and stolen Master Card.

102. On or about November 16, 2001, defendant PATRICIA MASON and others known and unknown to the grand jury traveled to Ridley State Creek Park, Pennsylvania and stole from a vehicle a Pennsylvania driver's license and PNC Bank Master Card ending in 3093 belonging to victim DD and fraudulently used the victim's personal identification to open a fraudulent line of credit at Sam's Club, Deptford, New Jersey and then used the line of credit to make fraudulent retail purchases totaling approximately \$2,035; and fraudulently used the stolen PNC Bank Master Card to conduct a retail purchase in the amount of approximately \$1,084 at

Sam's Club, Deptford, New Jersey.

103. On or about November 30, 2001, defendants JAMES BERRY, PATRICIA MASON, ENRICO CARPENITO, and ANGELO SAPIENZA, and others known and unknown to the grand jury traveled to the Garden State Discovery Museum, Cherry Hill, New Jersey, and stole from a vehicle a Pennsylvania driver's license, a First Union check card ending in 3026, a Macy's credit card ending in 0488, a CitiBank Visa ending in 4315, and a GM Master Card ending in 4018, belonging to victim PM and attempted to fraudulently use the stolen Macy's credit card to conduct a retail purchase at Macy's, Cherry Hill, New Jersey in the amount of approximately \$1,062; and fraudulently used the stolen credit cards to conduct retail purchases at Home Depot, Lawnside, New Jersey; and Home Depot, Cherry Hill, New Jersey.

104. On or about March 22, 2004, at Philadelphia, Pennsylvania, defendants JAMES BERRY and JOSEPH MEHL stole from a vehicle an identification card belonging to victim ET, defendants being in possession of a loaded firearm and six master keys to vehicles.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 17, 2000, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOHN SEGARS, and
DINA RIDOLFO**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and willfully caused the use and attempted use of, unauthorized access devices as described below, to obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$6,029, during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	1978	DE
Master Card	3394	DE
Discover	7203	DE

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029 (b)(1) and

2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2000, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**JOHN SEGARS, and
SAMANTHA AMMAR**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$5,479,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	7066	NM
Visa	0713	NM

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and

2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about April 2, 2001 to on or about April 3, 2001, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN SEGARS

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and willfully caused the use and attempted use of, unauthorized access devices as described below, to obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$49,495, during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	7245	MF
Visa	7902	RB
Discover	9248	CT
Master Card	0652	CT
Discover	7879	MP
Visa	2630	MP

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029 (b)(1) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2001, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTHONY COISOMIA,
a/k/a “Anthony Crisomia,”**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and willfully caused the use and attempted use of, unauthorized access devices as described below, to obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,779, during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
American Express	1008	CG
Discover	8465	CG

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 17, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendant

JOHN SEGARS

unlawfully transported and aided and abetted the transportation in interstate commerce from
Medford, New Jersey to Philadelphia, Pennsylvania goods and merchandise with a value in
excess of \$5,000.00, that is, two fur coats valued at a total of approximately \$15,000 belonging
to victim JR knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 25, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**JOHN SEGARS, and
DINA RIDOLFO**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and willfully caused the use and attempted use of, unauthorized access devices as described below, to obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,018, during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	2693	JB
Discover	5664	JB

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029 (b)(1) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a “Rico,” and
PATRICIA MASON**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,333,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	6810	RA

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 6, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendant

JAMES BERRY

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$4,962,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
American Express	1002	RH
Master Card	7061	RH

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
JAMES BERRY, and
MICHAEL PACITTI**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,195,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
American Express	3005	MA
Bank of America Debit	3118	MA

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 14, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
JAMES BERRY, and
PATRICIA MASON**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$4,397,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
CitiGroup	6441	AP

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendant

MICHAEL PACITTI

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,466,
during a one-year period and thereby affecting interstate commerce:

**CREDIT CARD
ISSUER**

**LAST FOUR DIGITS
CREDIT CARD
ACCOUNT NUMBER**

**INITIALS OF
CREDIT CARD
ACCOUNT HOLDER**

Discover

0140

NG

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a “Rico,” and
JAMES BERRY**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$5,558,
during a one-year period and thereby affecting interstate commerce:

**CREDIT CARD
ISSUER**

**LAST FOUR DIGITS
CREDIT CARD
ACCOUNT NUMBER**

**INITIALS OF
CREDIT CARD
ACCOUNT HOLDER**

Visa

5034

BW

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 23, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
JAMES BERRY, and
PATRICIA MASON**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$2,623,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Master Card	1202	MO

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2001, in the Eastern District of Pennsylvania, and elsewhere,
defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
JAMES BERRY, and
PATRICIA MASON**

knowingly and with the intent to defraud used and attempted to use, and aided and abetted and
willfully caused the use and attempted use of, unauthorized access devices as described below, to
obtain merchandise and other things of value aggregating \$1,000 or more, that is at least \$3,363,
during a one-year period and thereby affecting interstate commerce:

CREDIT CARD ISSUER	LAST FOUR DIGITS CREDIT CARD ACCOUNT NUMBER	INITIALS OF CREDIT CARD ACCOUNT HOLDER
Visa	3447	KS
Master Card	9295	KS

In violation of Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

JOSEPH MEHL,

having been convicted in a court of the New Jersey Superior Court in Gloucester County, New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Kel-Tec, model P-11, 9mm pistol, with an obliterated serial number, loaded with nine rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

JAMES BERRY,

having been convicted in a court of the Delaware County Court of Common Pleas in the
Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding
one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Kel-Tec,
model P-11, 9mm pistol, with an obliterated serial number, loaded with nine rounds of
ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. As a result of the violation of Title 18, United States Code, Section 922(g)(1), set forth in this indictment, defendants

**JOSEPH MEHL, and
JAMES BERRY**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of such offense, including, but not limited to: a Kel-Tec, model P-11, 9mm pistol, with an obliterated serial number, and nine rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 371, 1029(a)(2), 1029 (b)(1) and 2, set forth in this indictment, defendants

**ENRICO CARPENITO,
a/k/a "Rico,"
MICHAEL PACITTI,
JOHN SEGARS,
JAMES BERRY,
PATRICIA MASON,
ANGELO SAPIENZA,
CHRISTOPHER PACITTI,
JOSEPH SMALL,
TIMOTHY FARMER,
JOSEPH TRAVIA,
JOSEPH MEHL,
RONALD COPPERTINO,
ROSEMARY AMICONE,
ANTHONY COISOMIA,
a/k/a "Anthony Crisomia,"
SAMANTHA AMMAR,
THERESA SHOESTER,
DINA RIDOLFO,
CHRISTINE DALY, and
JOHN JAMES BROADLEY**

shall forfeit to the United States of America any property constituting, and derived from, proceeds the defendants obtained directly and indirectly as the result of the violations as charged in this indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(a)(2)(B).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney